IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Bankruptcy No. 16-15138-elf

CHARLES GRESHAM, Jr., Chapter 13

Debtor, Document No.

CONSUMER PORTFOLIO SERVICES, INC.,

Related to Doc. No.: 42
Movant

v.

CHARLES GRESHAM, Jr., and SHANITA PRICE, and WILLIAM C. MILLER, Ch. 13 Trustee,

Respondents

NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE

Consumer Portfolio Services, Inc., has filed a Motion for Relief from the Automatic Stay and Co-Debtor Stay with the Court to lift the automatic stay regarding the 2015 Hyundai Sonata Sedan 4D SE 2.4L I4, VIN 5NPE24AF1FH009201.

<u>Your rights may be affected.</u> You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **April 29, 2017**, you or your attorney must do all of the following:
 - (a) file an answer explaining your position at:

Clerk, U.S. Bankruptcy Court Eastern District of Pennsylvania Robert N.C. Nix, Sr. Federal Courthouse 900 Market Street, Suite 400 Philadelphia, PA 19107 If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorneys:

Peter J. Ashcroft, Esquire Bernstein-Burkley, P.C. 707 Grant Street, Suite 2200, Gulf Tower Pittsburgh, PA 15219

- 2. If you or your attorney do not take these steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
- 3. A hearing on the motion is scheduled to be held before the Honorable Eric L. Frank on **May 9, 2017** at **9:30 a.m.** in the Robert N. C. Nix, Sr. Federal Courthouse, 900 Market Street, Courtroom #1, Philadelphia, PA 19107.
- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

By: /s/ Peter J. Ashcroft
Peter J. Ashcroft, Esq.
PA I.D. #87317
pashcroft@bernsteinlaw.com
707 Grant Street, Suite 2200, Gulf Tower
Pittsburgh, PA 15219
(412) 456-8107
Fax: (412) 456-8135

Counsel for Consumer Portfolio Services, Inc.

Dated: April 14, 2017